

FILED 18 APR '25 10:23 USDC-ORP

IN THE UNITED STATES DISTRICT COURT,  
DISTRICT OF OREGON

In the Matter of:

Case No

3:25-cv-638-JR

VYACHESLAV STEVEN KIOROGLO

Plaintiff,

vs.

State of Oregon, Department  
of Justice for the State of  
Oregon, Ellen Rosenblum,  
former Attorney General for  
the State of Oregon, Kate  
Brown, Former Governor for  
the State of Oregon,  
Representative Hoa Nguyen  
for District 48, City of  
Portland, OR.

**COMPLAINT**

(Breach of Public Trust, Intentional  
Infliction of suffering and stress, loss of  
opportunity, Religious and Racial  
Discrimination)

Defendants

**Self represented**

VYACHESLAV STEVEN KIOROGLO

5931 SE EQUESTRIAN DR

PORTLAND, OR 97236

VYACHESLAVKIOROGLO@GMAIL.COM

(971)818-1937

COMES NOW, Plaintiff Pro Se Vyacheslav Steven Kioroglo ("Plaintiff"), and by way of Complaint and Claim against the Defendants above-named, alleges to the Court as follows:

**PARTIES**

1.

Plaintiff is a natural person, and has been a resident of the County of Multnomah and State of Oregon when the incidents occurred

2.

All actions complained of herein occurred within, or had their origin or nexus within the State of Oregon and all defendants were an active Governmental agencies or employees and upon information and belief, conducted regular and sustained duties for the State of Oregon.

**THE DEFENDANTS**

**I.**

**State of Oregon,**

**Office of the Governor**

900 Court Street, suite 254  
Salem, OR 97301-4047  
503-378-4582

**Department of Administrative Services**

Executive Building  
155 Cottage Street NE  
Salem, OR 97301-3972  
503-881-2427  
risk.management@das.oregon.gov

**II.**

**Department of Justice for the State of Oregon,**  
**Ellen Rosenblum, former Attorney General for the State of Oregon,**  
1163 State Street, Salem, OR 97301-2562  
503-947-4540  
AttorneyGeneral@doj.oregon.gov

**III.**

**Representative Hoa Nguyen for District 48,**  
Representative District 48  
900 Court St. NE, H-473,  
Salem, Oregon 97301  
503-986-1448  
Rep.HoaNguyen@oregonlegislature.gov

**IV.**

**City of Portland**  
**OMF Bureau of Revenue and Financial Services**  
**Risk Management Division**  
1120 SW 5th Ave, Room 1040  
Portland OR 97204-1912  
d: (503) 823-5256 f: (503) 823-6120  
[jessica.bird@portlandoregon.gov](mailto:jessica.bird@portlandoregon.gov)

**STATEMENT OF FACTS**

**On November 9, 2015** a discrimination complaint was filed with Oregon Department of Justice. This complaint, if properly addressed, would eliminate most misunderstandings at its core. Ironically, the original complaint involved a \$5,000 contract with the main State and Federal sponsored organization IRCO. The complaint involved few organizations, Sulamita Slavic Church representing "Radio Svet on 1130 AM" Portland Christian radio, IRCO-main organization serving immigrant communities thus having most connections for community growth within State agencies and Bustos Media of Oregon, Company that leased radio frequencies to other Slavic community radio stations. 1010AM, 1130AM, 1520AM. Oregon Department of Justice was asked for an inquiry into community relations, this inquiry was dismissed, I believe unlawfully. Because the above mentioned parties were not addressed properly from the start, that allowed the situation to go spiral for next years leading to the current situation. During the time from the first complaint to Oregon Department of Justice until the "takeover" in November 2016, I've filed multiple complaints with FCC, FTC, and other agencies without any real help. After many tries, in around **July of 2016**, (few months before the termination) I started a conversation with the office of former Attorney General Ellen Rosenblum that lasted until the termination process occurred in November 2018. During that period, our community together with the whole United States was experiencing Russian government incursion in our political life. Our shows were bombarded by hateful calls, prompting Police and FBI inquiries. It was a critical time for the Department of Justice to show support and presence in the community. Not to arrest but to protect. Sadly, nothing happened. On the other hand, we got a really really cold shoulder. Which is understandable but not unacceptable. The fact that Oregon Department of Justice did not get involved on any level the second time it was asked for help, even after seeing the situation on their own, knowingly refrained itself from the situation thus placing itself in direct involvement, now knowingly refusing to look at a crime committed right before their eyes. Since the "takeover" that happened in November of 2016, during our legal process until around 2018 I was constantly asking Oregon Department of Justice to interfere on our behalf, but my requests were always left without a reply.

**In December of 2019**, I filed a Police report with Portland Police Department. The report was submitted with distorted facts, thus making it impossible to be evaluated correctly by the District

1 Attorney's office. The report was dismissed by the District Attorney office based on wrong info  
2 provided in the report by the intake officer of Portland Police Department. I was not notified of the  
3 dismissal, didn't get any contact back whatsoever.

4 **Around August of 2020** I was notified that 1010AM radio station might be going off the air  
5 because new owners cannot pay for the rent of the frequency.

6 **On September 18<sup>th</sup>** of 2020 I've notified Oregon Department of Justice and demanded the  
7 General Attorney Ellen Rosenblum to issue a restraining order into this matter until the District  
8 attorney gets a chance to review the correct report. So the station doesn't go off the air completely thus  
9 losing its listeners and clients forever, as well as any evidence concerning my police report. At the  
10 same time, I tried to update my report as I was advised by the District Attorney office in order for  
11 them to review it. Little later I registered an official protest with the City of Portland and Portland  
12 Police Department was notified. Oregon Department of Justice was also asked again to get involved.  
13 Until **December 17, 2020** I tried to submit an updated Police report through the Portland Police  
14 department, but was denied the right to do so.

15 **On December 18<sup>th</sup>** I went before Ellen Rosenblum synagogue Beth-Israel with a peaceful  
16 protest and demanded her involvement. She didn't respond, instead the next day radio station went off  
17 the air.

18 I believe because Oregon Department of Justice didn't respond to my complaints even with registered  
19 official protest, the Police report was not resubmitted. Because the report was not resubmitted by the  
20 Portland Police Department in a timely manner. That resulted in my case not being properly  
21 investigated by the District Attorney. Also I believe because Oregon Department of Justice and  
22 Portland Police Department were aware of my complaints and registered protest since **September 18<sup>th</sup>**  
23 **of 2020** as well my communications with Portland Police Department through **December 17<sup>th</sup> of 2020**,  
24 promising me re-submission of my updated police report, but changing it's promise on **December 17<sup>th</sup>**  
25 **of 2020**, and because of my physical protest on **December 18<sup>th</sup> of 2020** in front of the Synagogue  
26 Beth-Israel where Attorney General Ellen Rosenblum is a member, that resulted in the closing of the  
27 radio station and Slavic Community losing its alternative community media on 1010 AM. I believe  
28 that was done with intention to inflict unnecessary pain and suffering and because of discrimination  
29 for my beliefs, official complaints and an official registered protest.

1 **Around August of 2022**, I filed another lawsuit against Bustos Media Holdings LLC concerning my  
2 radio station on 1010am. And on **October 26<sup>th</sup> of 2022** I've met with then acting Attorney General  
3 Ellen Rosenblum at a "Lunch with Attorney General" event. There we agreed for our future  
4 cooperation with the Slavic community. Then I was holding a "Business community relations"  
5 position at Slavic community Center and Slavic family radio station on 1040AM. We discussed a  
6 proposition to doing radio programs for the community specifically about business-consumer and civil  
7 rights laws from the Oregon Justice Department. Also we discussed with the assistant our previous  
8 communications leading to the closure of 1010am radio station. And I was assured by assistant Klem  
9 Ellen over zoom meeting, that General Attorney Helen Rosenblum would review the previous ruling  
10 of my case, as well as situation with the closing of the station in 2020 and would respond in writing to  
11 my request. This explanation was submitted to the Judge Howes in Multnomah County Circuit court  
12 when I asked for Ex Parte Motion for Continuance, to allow me more time to present evidence for my  
13 case as well to have enough time for General Attorney Helen Rosenblum for her review and answer  
14 letter to me, which was necessary for the court's decision.

15 **On November 18th, 2022** I had a court hearing about the case#22cv25866. I was given time until  
16 **December 2nd, 2022** to provide evidence. **On December 2nd, 2022** I've asked court for continuance  
17 and I explained that I have been in contact with General Attorney of Oregon, Helen Rosenblum  
18 through her both assistants, and I am waiting for the response on review of my previous case #  
19 17cv32035 ruling. Because the opposing party has submitted a ruling from the previous Judgment for  
20 anti-slap motion, in order to stop the new case going further.

21 **Before December 1, 2022**, we had many email correspondences and even 30min zoom conference  
22 with an assistant to Ellen Rosenblum of Oregon Department of Justice. But, when I sent them all the  
23 required paperwork for review on **December 1st, 2022**, the office of Oregon Department of Justice  
24 stopped communicating with me all together, even for the programming that we discussed concerning  
25 our community. This pattern of their behavior was a direct discrimination and a total breach of public  
26 trust, as well as intentional Infliction of pain and suffering, the loss of opportunity for me to work for  
27 our community on Slavic Family radio station at Slavic community center. As well their repeated  
28 failure to respond as they have promised has resulted in not submitting my evidence to the court on  
29 time thus resulting in a dismissal of my case by the Circuit court Judge of Multnomah county. I  
30 Believe and now know this was a violation of not only my consumer rights, or citizen's rights, but also  
31 human rights. And again proves their discrimination and supports my other claims.

1 I have filed two Tort claims with the Oregon Department of Justice because of their actions, since our  
2 correspondence have started. My first Tort claim against the State of Oregon had an explanation about  
3 the General Attorney's office not responding to my discrimination complaints, which resulted in loss  
4 of my business and community radio station. After our second engagement and their repeated refusal  
5 to work with me I have filed and updated second Tort claim with the State of Oregon, because now it  
6 has become a pattern and a clear proof of their targeted negligence and supports my other claims.  
7 Breach of Public Trust, Discrimination, Loss of opportunities and infliction of unnecessary suffering  
8 and stress to me and my family, as well to our community that the radio was serving..

9 **On April 2022**, I've sent a Petition to Governor Kate Brown, and the Democratic party of  
10 Oregon about the situation with our community Radio Station and explained in full who we are and  
11 that we are facing discrimination and need their help. That email was never answered, never there was  
12 any contact back. That is why they are connected as defendants to this complaint. Because their refusal  
13 to respond to a petition representing part of the community, puts them as supporters of discriminatory  
14 actions by the ruling party of Oregon.

15 **In April 2023**, I have met with Legislative Aide, Representative Hoa Nguyen, Oregon State  
16 Legislature, House District 48, Representative of my home district and asked her for a letter of support  
17 to Oregon Department of Justice through her assistants. Also, I've have explained that we are facing  
18 discrimination from Oregon Department of Justice and was assured she would try to help us get some  
19 answers. We also talked about doing programs on my english language slavic community show that I  
20 have on Portland's community station KBOO. and Also submitted to her office my Petition to  
21 Governor Kate Brown and the Democratic Party, and asked her for help with presenting a bill to  
22 Oregon legislature for a special protected status against discriminating people with similar beliefs,  
23 because of our previous years dealing and not getting proper response from Oregon Justice  
24 Department and many other State and Federal agencies. Those communications, even though started  
25 pleasantly, but also ended up with no radio programs for our community, with them stopping  
26 responding to my emails. That is why they are also defendant's on this case.

**DAMAGES****NOTICE OF RIGHT TO AMEND**

The Plaintiff believes, upon information and relief, that discovery herein may reveal additional causes of action, and/or additional defendants. Plaintiff reserves the right to amend his complaint to reflect such additional causes of action and/or additional defendants as may be appropriate. Plaintiff further alleges that the actions of the Defendants, as set forth above, were so egregious, so undertaken with malice, and/or a reckless and outrageous indifference to a highly unreasonable risk of harm, so in conflict with public policy, and that the Defendants have acted with such a conscious indifference to the health, and/or safety, and/or welfare of the Plaintiff, that the Plaintiff should be permitted to seek punitive damages. Plaintiff therefore hereby provides notice of his intent to move this court, pursuant to the provisions of ORS 31.725(2), to be permitted to further amend his Complaint herein, so as to seek an award of punitive damages. The actions described above by the Defendants constituted Breach of Public Trust, Intentional Infliction of suffering and stress, loss of opportunity, Religious and Racial Discrimination . As a direct, proximate, and foreseeable result of the Defendants' , the Plaintiff has lost almost 10 years' worth of projected income, in addition, because of loosing my business and their ignorance to my official complaints, I was diagnosed with severe depression and had to go through a treatment with a professional counselor for more then a year. My family went through almost loosing our house, eventually resulting in modification of our loan from 3.5% to 7.25% intrest ratec which added around \$1000 extra payment to our mortgage for next 30 years, plus accumulation of late fees around \$100,000, plus a back repayment of around \$100,000. Additionally more then \$100,000-\$200,000 were added as a leans on our home for lawyer fees, repossession of vehicle, credit cards payments, etc. Additionally , the final loss of ability to lawfully return my station back through Oregon's court system because of it's closing in December 2020, eliminated the ability to work in the future for the community, thus working in my profession that I have spent more then a dacade preparing for. The Plaintiff is therefore entitled to a judgment and money award in his favor and against the Defendants, in the sum of \$10,000,000 or such other reasonable amounts that would be enough to restart new radio station, hire back new employees, compete with grown competitor's radio stations and other community organizations. As well to reestablish trust with community organizations, public listeners, reputation and everything that has to do with coming back into the public spotlight.

**1.BREACH OF PUBLIC TRUST**

Oregon Revised Statutes (ORS) 130.800 and 130.805 are related to breach of trust:

- ORS 130.800: Remedies for breach of trust
- ORS 130.805: Damages for breach of trust

**2. INTENTIONAL INFLICTION OF SUFFERING AND STRESS**

Oregon Revised Code (ORS) 426.385 covers intentional infliction of physical pain or injury. ORS 31.710 also allows victims of emotional distress to seek non-economic damages in court.

**3. LOSS OF OPPORTUNITY**

Oregon Revised Statute (ORS) 31.225 outlines the requirements for proving special damages in defamation cases, which can include lost business opportunities. This law ensures that plaintiffs can only recover financial compensation for losses that are directly linked to the defamatory statement.

**4. RELIGIOUS AND RACIAL EMPLOYMENT DISCRIMINATION**

A civil action under ORS 659A.885 (Civil action) against a public body, as defined in ORS 30.260 (Definitions for ORS 30.260 to 30.300), or any officer, employee or agent of a public body as defined in ORS 30.260 (Definitions for ORS 30.260 to 30.300), alleging a violation of ORS 243.323 (Prohibition against entering into agreement with employee that prevents employee from discussing workplace harassment), 659A.030 (Discrimination because of race, color, religion, sex, sexual orientation, gender identity, national origin, marital status, age or expunged juvenile record prohibited), 659A.082 (Discrimination against person for service in uniformed service prohibited) or 659A.112 (Employment discrimination) must be commenced not later than five years after the occurrence of the alleged violation unless a complaint has been timely filed under ORS 659A.820 (Complaints).

**TIMELINE**

1. 12-31-13 First FCC discrimination complaint 1130 AM radio svet
2. 08-27-15 FCC defamation complaint Slavic Family radio 1130AM
3. 11-09-15 DOJ discrimination complaint filed \$5000 IRCO contract
4. 07-12-16 DOJ replied to discrimination complaint denied review
5. 08-01-16 first Request to the DOJ for Interview, 11-07-16 rescheduled for December. 11-16-16 lost station. 12-13-16 2ND request for DOJ investigation. 12-22-16 DOJ sent my complaint to Consumer complaint dept for review...
6. 03-21-18 Senator Thomson investigation results from DOJ/denial
7. 09-21-19 OREGON DISCRIMINATION STATUTE OF LIMITATION RAISED TO 5 YEARS
8. 12-6-19 Filed police report with PPD
9. 02-1-20 Found out that Police report was wrong
10. 09-08-20 Trying to register protest with PDX/
11. 09-18-20 Transferred to PPD for protest info
12. 09-18-20 DOJ restraining order request to stop closure of 1010 AM, transferred to no reply email registered protest with City of Portland-Transferred to PPD for protest info.
13. 09-25-20 Asked PPD to updated report to District attorney after speaking with DOJ
14. 10-13-20 Trying to update police report until Dec, 9 2020
- Tashia.Hager@portlandoregon.gov
15. 12-17-20 Protest in front of Beth Israel
16. 12-18-20 RR7/Nashe Radio went off the air
17. 12-24-20 Petition to Move to Israel/Asylum
18. 03-01-21 Acker took the case
19. 12-27-21 File Tort with State

- 1 20. 01-17-22 Acker dismissed
- 2 21. 02-01-22 Petition to Governor Kate Brown
- 3 22. 02-16-22 automatic funny reply two years later from Portland Police Department
- 4 Brian.Hughes@portlandoregon.gov
- 5 23. 04-21-22 Petition to Mayor/ Slavic Advisers
- 6 24. 05-17-22 Oregon Tort sent to adjuster
- 7 25. 08-05-22 Bustos 2nd case filed
- 8 26. 08-22-22 District attorney Mike Schmidt reply confirmed PPD responsibility to submit
- 9 updated police report
- 10 27. 10-26-22 Met with Ellen Rosenblum at the Jewish event
- 11 28. 11-09-22 Klem Ellen set zoom for Dec 1 after rescheduling from Nov 17. Asked to do
- 12 radio programs for DOJ for Slavic consumers on 1040AM
- 13 29. 12-01-22 Zoom meeting with DOJ Ellen Klem, promise for Attorney General Personal
- 14 response and promise for legal shows from OJD and OSB on Slavic Family radio. 30
- 15 conversation Ellen Klem jokingly sends me to the Russian embassy. I had to re prime her by
- 16 letting her know I am an American citizen.
- 17 30. 12-16-22 contacted Edmunson Kristina DOJ assistant,out of the office reply
- 18 31. 12-20-22 contacted Ellen Klem DOJ, out of office reply till Jan 3rd
- 19 32. 02-06-23 Multnomah Court denied continuation request,
- 20 33. 02-07-23 final request to DOJ to respond for my court by 02-10-23, Tort claim restart
- 21 date set
- 22 34. 02-24-23 refiled Tort claim with State/new updated
- 23 35. 03-23-23 Tort claim denial letter
- 24 36. 4-14-23 Representative Hoa Nguyen Asked for assistance, transferred to Oregon Trial
- 25 lawyers association for help...until 05-31-23
- 26 37. 08-23-23 Final PDX Tort

- 1 38. Tried to contact Beth Israel got transferred to Special Agent in charge at DOJ  
2 39. 08-23-23 Rich Austria special agent in charge replied after a phone call I asked him to  
3 ask PPD for review of my case. (Told to go to court)  
4 40. 05-17-24 Final replay from DOJ(risk management) denying any wrongdoing  
5  
6  
7  
8  
9

10  
11 DATED, 04-11-25 this day 11 of , 2025.

12 

13 Vyacheslav Steven Kioroglo, Plaintiff Pro Se  
14

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16 Portland, Oregon 97236  
17 vyacheslavkioroglo@gmail.com  
18 (971)818-1937  
19  
20

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